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**City of**  
**NORWALK**

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November 18, 2010

Lynda Deschambault  
Remedial Project Manager  
U.S. EPA Region 9 (SFD-7-1)  
75 Hawthorne Street  
San Francisco, CA 94105

**Re: Comments on Proposed Plan for Omega Operable Unit 2 -  
Groundwater Interim Remedy**

Dear Ms. Deschambault:

On behalf of the City Council, I would like to express our disappointment with EPA's decision to deny the individual requests from the Cities of Norwalk and Santa Fe Springs for public meetings in our respective communities. We strongly believe that residents in our communities deserve the right to provide input and comment on an issue of this magnitude, especially when the contamination lies underneath their homes. Separate from this comment letter, we will be submitting a joint letter with the City of Santa Fe Springs requesting you to reconsider that decision as expressed in your letter dated November 8, 2010.

With regards to the Proposed Plan for Omega OU 2 – Groundwater Interim Remedy, the City of Norwalk would like to submit the following comments and concerns:

1. The data used to compile the Omega OU 2 Remedial Investigation/Feasibility Study, which has led to the proposed alternative findings is at least 3 years old. According to this document the plume moves at a minimum rate of 540 feet per year. That document identifies the southern portion of the plume south of Imperial Highway, between Norwalk Blvd. and Bloomfield Avenue. Our October 21, 2010 letter asked EPA to identify the true extent of the plume as of 2010. We have not yet received that information. We believe that based on the described movement of this plume, it may be may be reaching the I-5 freeway by the end of 2010.

2. The Omega OU 2 – Remedial Investigation/Feasibility Study, identifies a horizontal plume migrating southwest from the Omega Chemical Plant in Whittier. However, this analysis does not take into account the “plunging plume” theory that seems to exist with these types of contaminants, particularly with the geological make up of this basin. The aquitar in the central groundwater basin is not continuous, therefore it allows for contaminants found in the shallow aquifers to seep into these broken segments. In addition, the constant pumping of groundwater in the basin creates a vertical pressure that forces contaminants to migrate further downward at a faster rate. These vertical gradients and “plunging plume” were not incorporated into the EPA model, so the model did not accurately describe the deeper extent of the plume.
3. EPA data from existing monitoring wells have been collected at a depth of no more than 150 feet. Based on comment number 2, we would like to see additional monitoring wells deeper than 300 feet below ground surface in order to truly delineate the vertical extent of the contamination.
4. The Omega OU-2 plume is not adequately defined at the southern end or leading edge of the plume given the limited data collected. This may impact the interim plan proposed by EPA to capture and contain the plume at the leading edge. Given the fact that groundwater is moving at a minimum rate of 540 feet per year and because the data is not current, the leading edge could be considerably further down gradient than currently estimated. If the proposed remediation extraction wells are not placed at the proper leading edge, a considerable amount of contamination may be missed and continue down-gradient to potentially contaminate other production wells.
5. A contingency plan is needed to address any potential delays with implementation of the interim remedy proposed by EPA. These potential delays include securing potentially responsible parties to accept the treated water, complying with legal and regulatory requirements, construction delays, and other issues. Meanwhile, the plume continues to move forward with each day that passes and the current location of the southern capture wells may not be in the correct location by the time OU-2 remediation system is finally put into operation.
6. If the proposed placement of the three extraction wells are to remain as indicated in your maps within our Civic Center area, the City of Norwalk needs to be notified. We understand based on your report that details regarding the specific number and location of the wells will be determined at a later time. However, the City is deeply concerned with the aesthetics

of these facilities and impact they may have in this area. We would like to formally request to be included in these discussions and that all City permitting requirements be followed.

7. It is our understanding that the Potentially Responsible Parties (PRP) will be mandated by EPA to implement the proposed interim remediation plan. However, given the urgency of immediate remediation to contain the Omega OU-2 plume, we request that EPA determines this project to be a "Fund Lead Project" so that a remediation plan can be implemented in a more timely manner in order to protect drinking water wells from further contamination.

Although we support the immediate containment and future remediation of the Omega Plume, we are unable to support EPA's preferred alternative for an interim remedy. We understand that EPA's Preferred Alternative No. 6, consisting of plume wide extraction with drinking water end use, would treat this contaminated water to meet federal and state drinking water standards. However, we believe this alternative will not be acceptable to the residents of our community that would ultimately receive this treated water without additional efforts by EPA to educate and inform our community about the water treatment processes.

We find that a combination of Alternative No. 4 – Plumewide Extraction with Reinjection, and Alternative No. 5 – Plumewide Extraction with Spreading Basin Recharge, will benefit the region as a whole. A mixed of these two alternatives can allow for continuous pumping, which is needed for the treatment process and containment of this plume.

We thank you for the opportunity to comment on the Propose OU-2 Plan and urge you to consider these comments before a final decision is made. If you have any questions or would like to discuss this further, please contact Adriana Figueroa, Administrative Services Manager at (562) 929-5915.

Sincerely,

A handwritten signature in black ink, appearing to read "Gordon Stefenhagen", with a long horizontal flourish extending to the right.

Gordon Stefenhagen  
Mayor

cc: City Council